This comment is in response to the Petition for Rulemaking, filed by the National Council of Volunteer Examiner Coordinators (NCVEC) RM-10787.

I am opposed to RM 10787.

I am in favor of retaining morse code proficiency testing (Element 1) for acquiring an **Amateur Extra** class license. I think that retaining it only for the Amateur extra class license is a **compromise** that all parties can agree on.

As we know, morse code is the oldest form of wireless communication and has been synonymous with amateur radio from the start. Yes, it seems antiquated and outdated, but it is still used by the majority of amateur radio operators. (According to an online poll conducted by the American Radio Relay League (ARRL), **67.4% of the amateur radio operators polled use morse code!** This poll was open to anyone visiting the popular ARRL site.)

Many times when tuning across the amateur bands, the **majority** of communications are being conducted via morse code. This is especially true when conditions are marginal and other modes are attenuated by less than favorable band conditions.

Morse is a viable form of communication that can be extremely efficient. No, it's not as "sexy" or "cutting-edge" as other forms of digital communication and it takes work to master, but efficiency is not just getting a signal through (although morse code is proven very capable in this respect).

The complexity of equipment used to transmit and receive signals and the amount of power necessary to communicate can be big a factor, especially in an emergency situation. There are some digital modes that rival morse code insofar as the ability to convey information under marginal HF band conditions, but they all require more complex transceivers as well as a computer terminal and most require some kind of specific radio modulator/demodulator (modem) to function. Some require only a computer equipped with a sound card, but still require a single-sideband capable transceiver. Expense of equipment to amateur radio operators who are not paid for what they do can also be a factor.

Morse code requires only a simple transceiver and key to function. It is far more efficient than single-sideband and can be more effective at 5 watts of power than single-sideband at more than 100 watts of power. Simple wire antennas such as a dipole can be more effective with morse code than single-sideband with a large tower and a directional gain-type antenna. For the sake of simplicity, efficiency and expense, morse code is the clear winner.

If morse code were completely eliminated from testing, it would certainly become a dying mode. Most new amateur radio operators would not bother to learn it because it takes a bit of work to master. Consequently, as a mode, it would die off with the remaining operators.

This mode is far too valuable a resource to let die. I don't think that eliminating morse code testing completely will help amateur radio as a service. I think the opposite could happen. Increasing the number of operators by making it easier to obtain a license doesn't necessarily mean betterment of the service. Letting this superb, useful and efficient mode die would be a great disservice to our country and to the amateur radio service.

I think that a compromise could be agreed on. That compromise being to retain morse code element 1 testing only for the Amateur Extra class license. This would give access to most of the amateur HF allocations via the General class license, but still retain morse code as the viable mode that it is. I don't think that it's too much to ask for mastery of five words-per-minute morse proficiency to obtain the highest-class amateur radio license.

Thank you,

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